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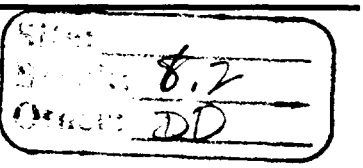
March 24, 1992



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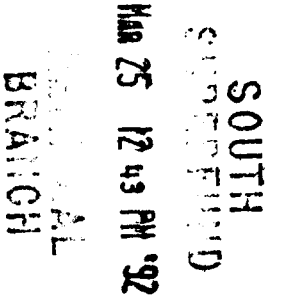
Mr. Bradley A. Jackson
Remedial Project Manager
South Superfund Remedial Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365



Dear Mr. Jackson:

I have received the faxed copy of your letter dated March 17, 1992. The Gold Coast Steering Committee concurs with the understandings expressed and proposals made in your letter concerning my Clean Closure Plan for the Gold Coast site, with the following exceptions. First, that the Statement of Work (SOW) attached to the Consent Decree anticipates the possibility that groundwater pumping may not result in attainment of the ROD criteria. The SOW addresses this possibility on pages 12 and 17. The Steering Committee would thus propose to modify the proposal to state that the Steering Committee reserves the right, in the event that continued pumping should somehow fail to attain the ROD criteria in a reasonable additional time period, to consult with EPA concerning an alternative proposal for terminating the Remedial Action.

Another exception is described more fully in the attached letter from our consultant Dr. Edward Clark. Basically, Dr. Clark proposes that the re-start of the system not be triggered unless the ROD parameters are exceeded by more than 150%. His reason for this proposal is the margin of error built into the analytical techniques. In Dr. Clark's view, an exceedance of a ROD parameter by less than 150% has no real significance, and would only start numerous start/stop/re-start cycles caused only by laboratory variation and not

any real change in site conditions. Of course, if there are several on/off pump cycles, it may be appropriate to consult with EPA concerning alternative pumping end-points as provided for in the SOW.

With these modification, the Steering Committee adopts and incorporates your letter into my proposal dated February 3, 1992. Barring any objection from EPA, the Steering Committee would like to proceed along this agreed-upon path toward the completion of the Remedial Action for the Gold Coast Site. Realistically, room must be left to negotiate since the data will fluctuate due to the nature and structure of the Miami oolite formation. Basically, the site is cleaned up; however, the numbers can jump around somewhat. With values in the range of 1-2-3-4-5 parts per billion, it is unrealistic to say that a number picked years ago would represent the true situation we face today. I feel, if we look at this in a true sense and objectively, we can come to a mutual understanding without jeopardizing human health or our environment. We would appreciate a response at your earliest opportunity.

Sincerely yours,

A. L. SIMMONS
Remedial Action Coordinator

ALS/jme

Enclosure

CC: Dan DiDomenico, FDER
Robert Johns, DERM
Larry Kirsch, Esquire
Peter Baljet, Baljet Corp.
Marvin Collins, FDER
Leslie Allen, DOJ
Edward Clark, Baljet Corp.

THE BALJET CORPORTATION/
EDWARD E. CLARK ENGINEERS–SCIENTISTS, INC.

March 20, 1992

Mr. A.L. Simmons
Remedial Action Coordinator
Gold Coast Steering Committee
1200 Odessa Drive
Richardson, Texas 75080

Re: Gold Coast Oil Superfund
Site, Miami, Florida

Dear Mr. Simmons:

I write in response to Mr. Jackson's letter of March 17, 1992 concerning the Clean Closure Plan (CCP) for the referenced site. I am in general agreement with the logic and sequence of events as outlined in Mr. Jackson's letter. However, I believe that predicating the sequence of events on meeting ROD criteria may be too restrictive and could unnecessarily prolong the closure process. I am suggesting that a margin of error be allowed around each ROD parameter and that only exceedance of this margin of error should trigger the reactivation of the treatment system after the initial shutdown.

Since the beginning of groundwater treatment, the results of the sampling episodes show dramatic reduction in each ROD constituent. However, since the ROD levels are at, or near, the analytical detection limit, one can expect to see fluctuations in the results due to the inherent variability in the analytical methodology. For example, EPA Matrix Spike Recovery limits specified in the CLP Statement of Work (dated February, 1988) for trichloroethylene, one of the ROD parameters for the Gold Coast Site, is 71 to 120 percent recovery or in other words, the "true value" may vary from 71 to 120 percent of the value reported. We are beginning to see this common phenomenon at the Gold Coast Site. A case in point is that in MW-11 trichloroethylene was 2.9 ppb and 1.2 ppb in December, 1991 and January 1992, respectively. In February, 1992 the concentration in the same well was 4.4 ppb (ROD criteria is 3.0 ppb) after considerable pumping of this well.

Aside from variances in the analytical work, it is common to see a "leveling off" of a volatile organic compound as the groundwater approaches cleanup.

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The Florida Department of Environmental Regulation (FDER) makes allowance for this phenomenon in the remediation of gasoline sites (see F.A.C. 17-770.730[7]).

The Gold Coast Statement of Work (SOW) also anticipated the need for determination of pumping end points higher than those established by the ROD (see SOW section 4.2.14, page 11). I am, therefore, proposing that once the ROD limits are attained in each well, pumping would be terminated. Once pumping is terminated, it should not be restarted unless the levels exceed 150% of the ROD limits. For example, for trichloroethylene, pumping would not be restarted unless the levels exceeded 4.5 ppb. This approach adjusts for statistical variation in the laboratory analysis before triggering the restart of the treatment system and would eliminate numerous stop and go cycles triggered only by minor numerical variations of no true significance.

Sincerely,

Edward E. Clark, Ph.D., P.E.
Assistant Project Director

EEC/cmm
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